

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

DEMOCRATIC NATIONAL COMMITTEE,
et al.

Civil Action No.: 81-3876 (JMV)(JBC)

Plaintiffs,

v.

REPUBLICAN NATIONAL COMMITTEE,
et al.

Defendants.

**DECLARATION OF
FRANK ANDERSON**

Pursuant to 28 U.S.C. § 1746, I, Frank Anderson, declare as follows:

1. My name is Frank Anderson. I am over the age of 18, have personal knowledge of the facts stated in this declaration, and can competently testify to their truth.

2. I am a U.S. Citizen, and a resident of Burke, Virginia. I currently work as the Executive Director for the Fairfax County Democratic Committee.

3. Sometime before October 20, 2016, I used my personal email account to sign up to receive information about volunteering as an election observer for the Donald Trump Campaign via the public sign-up page, located at:
<https://www.donaldjtrump.com/landing/volunteer-to-be-a-trump-election-observer>.

4. On October 20, 2016, I received an email from Luisa Guerra, vaelectiondayops@gmail.com, confirming my volunteer commitment and inviting me to attend an online training session. A true and correct copy of that email is attached hereto as Exhibit A, except that my email address has been redacted from this email.

5. I forwarded Ms. Guerra's email to my intern Steven Alvarez, and I asked Mr. Alvarez to sign up for the training. Mr. Alvarez informed me that he signed up for the training and forwarded me a confirmation email that he received on November 1, 2016 from Chris Marston, chris.marston@gmail.com, which contained the link to the training and a dial-in number. A true and correct copy of that email is attached hereto as Exhibit B, except that Mr. Alvarez's email address has been redacted from this email.

6. Mr. Marston's November 1, 2016 email also contained a pdf attachment entitled "Poll Watcher Resources." A true and correct copy of this document is attached hereto as Exhibit C.

7. The Poll Watcher Resources pdf (Exhibit C) contains a link to additional documents, <http://edo91.zendesk.com/>. Upon receipt of Mr. Marston's email, Mr. Alvarez accessed this link and downloaded the "Poll Watcher Training Power Point Slides," which he emailed to me. A true and correct copy of this powerpoint is attached hereto as Exhibit D.

8. On November 1, 2016, I joined the poll watcher training that was referenced in Mr. Marston's email (Exhibit B) via the dial-in number provided in that email. As a participant in the conference call, I recorded the training. A true and correct recording of a portion of that training is included as Exhibit E.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 3, 2016

Respectfully submitted,



Frank Anderson